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SOAH CONSOLIDATED DOCKET NO. 743-19-1265

PUC CONSOLIDATED DOCKET NO. 4878518

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JOINT APPLICATION OF ONCOR §  
ELECTRIC DELIVERY COMPANY §  
LLC, AEP TEXAS INC., AND LCRA §  
TRANSMISSION SERVICES §  
CORPORATION TO AMEND THEIR §  
CERTIFICATE OF CONVENIENCE §  
AND NECESSITY FOR 345-KV §  
TRANSMISSION LINES IN PECOS, §  
REEVES, AND WARD COUNTIES §  
TEXAS (SAND LAKE TO SOLSTICE §  
AND BAKERSFIELD TO SOLSTICE) §

BEFORE THE STATE OFFICE

PUBLIC UTILITY COMMISSION  
FILING CLERK

OF

ADMINISTRATIVE HEARINGS

**FORRISTER GENERATION-SKIPPING TRUST'S MOTION TO INTERVENE**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

NOW COMES, Forrister Generation-Skipping Trust ("Forrister"), pursuant to Public Utility Commission ("PUC") Procedural Rules §§ 22.101, 22.102, 22.103 and 22.104, and files this Motion to Intervene in the above referenced proceeding, and in support thereof, respectfully shows the following:

**I. AUTHORIZED REPRESENTATIVE**

Attorneys Patrick L. Reznik, Cassie Gresham, and Shane D. Neldner pursuant to P.U.C. PROC. R. 22.101(a), hereby notice their appearance as counsel on behalf of Forrister in the above-styled and numbered proceeding before the Public Utility Commission of Texas.

The name, address, and telephone number of Intervenor's authorized representatives is as follows:

Patrick L. Reznik  
**BRAUN & GRESHAM, PLLC**  
P.O. Box 1148  
Dripping Springs, Texas 78620

512-894-5426 (telephone)  
512-894-3405 (fax)  
Email: [preznik@braungresham.com](mailto:preznik@braungresham.com)

Forrister requests that the Commission and all parties to this proceeding serve copies of all notices, correspondence, pleadings, briefs, requests for information, and other documents on said authorized representatives.

## **II. JURISDICTION**

The Commission has jurisdiction over the parties and subject matter of this proceeding pursuant to PURA § 37.053.

## **III. BASIS FOR INTERVENTION**

Forrister has a justiciable interest in this proceeding. Forrister owns property that may be directly impacted by one or more of the routes for the Oncor Electric Delivery Company, LLC, AEP Texas, Inc., and LCRA Transmission Line Services Corporation's ("ONCOR, AEP & LCRA") proposed transmission line. Forrister has been notified by ONCOR, AEP, & LCRA that its property may be directly affected, as that term is defined in P.U.C. PROC. R. 22.52 (a)(3), by the proposed transmission line that is the subject of this docket. Forrister, therefore, has standing to intervene under P.U.C. PROC. R. 22.103(b)(2). The Motion to Intervene is filed within 45 days of the date ONCOR, AEP & LCRA filed their Joint Application and therefore is timely under P.U.C. PROC. R. 22.104(b). Forrister requests that this Motion to Intervene be granted and that it be recognized as a party.

#### **IV. ACKNOWLEDGEMENTS**

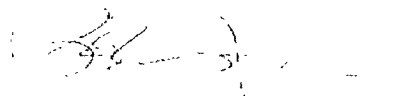
Forrister acknowledges: (1) Forrister will be a party to the case; (2) Forrister will be required to respond to all discovery requests from other parties in the case; (3) if Forrister files testimony, other parties may cross-examine them at the hearing; (4) if Forrister files any documents in this case, copies of those documents will be served to every other party in this case, except where modified by alternative service procedures set out by order in this proceeding; and (5) Forrister is bound by the Procedural Rules of the Public Utility Commission of Texas and the State Office of Administrative Hearings.

WHEREFORE, PREMISES CONSIDERED, the Forrister Generation-Skipping Trust respectfully requests that this Motion to Intervene be granted, that it be allowed to participate in this proceeding as a party with all rights thereof to the full extent that it desires to do so, and for such further relief to which they may be entitled.

Respectfully submitted,

BRAUN & GRESHAM, PLLC

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Shane D. Neldner  
State Bar No. 24062435

**ATTORNEYS FOR FORRISTER  
GENERATION-SKIPPING TRUST**

**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on December 21, 2018 in accordance with Public Utility Commission Procedural Rule 22.74.



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Patrick L. Reznik